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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 IN RE SUBPOENA TO
12 JIMMY NGUYEN

Misc. Case No. 2:20-mc-0026 RSL

13 IRA KLEIMAN, as the personal
14 representative of the Estate of David
15 Kleiman, and W&K Info Defense Research,
16 LLC,

17 Plaintiffs,

18 v.

19 CRAIG WRIGHT,

20 Defendant.

**DECLARATION OF VELVEL (DEVIN)
FREEDMAN IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL
COMPLIANCE WITH SUBPOENA**

NOTE ON MOTION CALENDAR:
April 24, 2020
WITHOUT ORAL ARGUMENT

DECLARATION

1. I am an attorney for Plaintiffs Ira Kleiman, as the personal representative of the Estate of David Kleiman, and W&K Info Defense Research, LLC (collectively, "Plaintiffs"). I am admitted to practice in the U.S. Supreme Court, Florida, District of Columbia, U.S. Courts of Appeals for the Ninth and Eleventh Circuits, and all U.S. District Courts in Florida.

2. I am over the age of eighteen. The statements in this declaration are based on my personal knowledge and they are true and accurate to the best of my knowledge and belief. I make this declaration in support of Plaintiffs' Motion to Compel Compliance with Subpoena, filed contemporaneously with this declaration.

3. Attached hereto as Exhibit 1 is a true and correct copy of the Order on Plaintiffs' Motion to Compel, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Aug. 27, 2019), ECF No. 277.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Order affirming in part and reversing in part the Order on Plaintiffs' Motion to Compel, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Jan. 10, 2020), ECF No. 373.

5. Attached hereto as Exhibit 3 is a true and correct copy of the Order granting in part Plaintiffs' Motion for Ninety Day Extension of Pretrial Deadlines and for Continuance of Trial Date, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Jan. 16, 2020), ECF No. 382.

6. Attached hereto as Exhibit 4 is a true and correct copy of the document subpoena directed to Mr. Nguyen.

1 7. Attached hereto as Exhibit 5 is a true and correct copy of the deposition subpoena
2 directed to Mr. Nguyen. This subpoena, along with the document subpoena referenced in the
3 preceding paragraph, are referred to as the “Subpoenas” below.

4 8. Attached hereto as Exhibit 6 is a true and correct copy of the Declaration of
5 Attempted Service of Process on Jimmy Nguyen, which was provided to Plaintiffs on March 11.

6 9. Attached hereto as Exhibit 7 is a true and correct copy of the Joint Discovery
7 Status Report, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Mar. 2,
8 2020), ECF No. 411.

9 10. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs’ counsel’s
10 March 10, 2020, email serving the Subpoenas on Mr. Nguyen. Mr. Nguyen had previously used
11 the same email address to communicate with Plaintiffs’ counsel as recently as October 23, 2019.

12 11. Attached hereto as Exhibit 9 is a true and correct copy of Plaintiffs’ Expedited
13 Motion for Enlargement of Time of Expert Related Deadlines and for Extension of Time to
14 Complete Three Fact Witness Depositions, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-
15 80176-BB (S.D. Fla. Mar. 24, 2020), ECF No. 436.

16 12. Attached hereto as Exhibit 10 is a true and correct copy of the Order Amending
17 Scheduling Order, *Ira Kleiman et al. v. Craig Wright*, No. 9:18-cv-80176-BB (S.D. Fla. Mar. 26,
18 2020), ECF No. 441.

19 13. Attached hereto as Exhibit 11 is a true and correct copy of the certified mail
20 delivery receipt showing delivery of the Subpoenas to Mr. Nguyen’s last known address.

21 14. Attached hereto as Exhibit 12 is a true and correct copy of Plaintiffs’ counsel’s
22 March 29, 2020, tweet serving the Subpoenas on Mr. Nguyen.

1 15. Attached hereto as Exhibit 13 is a true and correct copy of the Twitter Analytics
2 page for the tweet referenced in the preceding paragraph.

3 16. Attached hereto as Exhibit 14 is a true and correct copy of tweets and photographs
4 from Mr. Nguyen's Twitter feed.

5 I declare the foregoing statements to be true under the penalties of perjury under the laws
6 of the United States.

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8 Dated: April 6, 2020

/s/ Velvel (Devin) Freedman

Velvel (Devin) Freedman, Esq.

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